

EXHIBIT B

Duda, James

From: Duda, James
Sent: Monday, November 22, 2004 12:19 PM
To: 'Bruce A Tassan'
Subject: Baystate: Discovery Requests

Dear Mr. Tassan:

I'm sorry that you had to end our discussion regarding discovery matters so abruptly this morning, and that we were unable to discuss the remaining discovery issues or even begin to address possible further settlement discussions. Those were the reasons for my follow-up telephone call, to which you have so far been unable to respond. In any event, we hope that we can continue to move this matter forward cooperatively and with mutual respect.

The discovery issue needing most urgent attention at this time concerns your clients' outstanding discovery requests. As you know, Baystate Health System, Inc. (BHS) is quite a large organization, and the temporal and subject matter scope of the questions that your clients have propounded and the documents that they have requested require an extensive effort by BHS to prepare an adequate response. These difficulties are compounded, of course, by the upcoming holidays. Therefore, please let me know as soon as possible whether you will reciprocate our patience, as shown with respect to your clients' initial discovery disclosures, and agree to a 60-day extension for BHS to respond to your clients' requests.

Please let me know your response by tomorrow, so that we can avoid the necessity of bothering the Court with respect to this request.

We appreciate your courtesy in this matter.

Very truly yours,
Jim Duda

James C. Duda
Bulkley, Richardson and Gelinis, LLP
1500 Main Street, Suite 2700
Springfield, MA 01115-5507

Direct Dial: 413-272-6284
jduda@bulkley.com

EXHIBIT C

Duda, James

From: Bruce A Tassan [tm@tassan.com]
Sent: Monday, November 22, 2004 7:39 PM
To: Duda, James
Subject: Re: Baystate: Discovery Requests

Your client filed the lawsuit, so we assume your client was prepared to go forward. We want our discovery requests answered so that we can fully depose the president, vice president, and marketing director for Baystate Health Services. We will have subpoena served on these individuals to assure their attendance or they can go to jail.

We will ask for no extensions and we will not grant any.

Bruce

----- Original Message -----

From: [Duda, James](#)
To: [Bruce A Tassan](#)
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* * * * *

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Springfield, MA 01115-5507

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EXHIBIT D

Duda, James

From: Duda, James
Sent: Tuesday, November 23, 2004 11:50 AM
To: 'Adolphe Storey Esq.'
Subject: FW: Baystate: Discovery Requests

Dear Dutch:

Below is the most recent correspondence regarding our request for a discovery extension. Mr. Tassan's response is directly below, and our request is shown below that.

Thanks for your consideration

Regards.
Jim

James C. Duda
Bulkley, Richardson and Gelinas, LLP
1500 Main Street, Suite 2700
Springfield, MA 01115-5507

Direct Dial: 413-272-6284
jduda@bulkley.com

-----Original Message-----

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To: Duda, James
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jduda@bulkley.com

EXHIBIT E

Duda, James

From: Bruce A Tassan [tm@tassan.com]

Sent: Tuesday, November 23, 2004 7:08 PM

To: Duda, James

Subject: I will have subpoenas issued for the depositions to insure attendance. eom

Bruce Tassan
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Arlington, VA 22207-5211
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